

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., et al.,)	Case No.: 01-01139 - 01-1200 (JJF)
)	
)	Jointly Administered
Debtors)	Obj. Date: December 21, 2001
)	Hrg Date: January 3, 2002 at 9:30 a.m.

NOTICE OF MOTION

TO: Debtor Office of the US Trustee

Official Committee of Unsecured Creditors 2002 Service List

Pursuant to section 1112(b) of Title 11 of the United States Code ("Bankruptcy Code"), Zonolite Claimants hereby move to dismiss the Chapter 11 case filed by W.R. Grace & Co. ("Debtors") on the grounds that Debtors have filed for Chapter 11 protection in bad faith. The grounds for dismissing the Debtors Petition are set forth in the accompanying Memorandum of Law filed by the Zonolite Claimants in support of this motion.

You are required to file a response to the attached motion on or before **December 21, 2001.**

At the same time, you must also serve a copy of the response upon Movant's attorneys:

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HEARING ON THE MOTION WILL BE HELD ON **January 3, 2002 at 9:30 a.m.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT
MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER
NOTICE OF HEARING.

11/16/01
Date

BY: /s/ William D. Sullivan
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